G THE STANLEY LAW GROUP

IN THE UNITED STATES DISTRICT COURT FOR WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

DR. ROBERT W. MALONE)
Plaintiff)
v .) Case Number: 3:22-cv-63
PETER R. BREGGIN, MD. GINGER ROSS BREGGIN, AMERICA OUT LOUD, AND DR. JANE RUBY,))))
Defendants.)))

MOTION FOR THE AWARDING OF ATTORNEY'S FEES AFTER DISMISSAL OF PLAINTIFF'S AMENDED COMPLAINT FOR LACK OF PERSONSAL JURISDICTION PURSUANT TO RULE 12(b)(2) OF THE FEDERAL RULES OF CIVIL PROCEDURE

Pursuant to Federal Rule of Civil Procedure Rule 11 and 54(d)(2)(A), Defendants Peter R. Breggin, MD. And Ginger Ross Breggin (collectively, "the Breggins"), by counsel, move this Court for the awarding of attorney's fees and costs and sanctions pursuant to this Court's dismissal of the Amended Complaint filed by Dr. Robert W. Malone, (the "Plaintiff") for lack of personal jurisdiction over Dr. and Mrs. Breggin.

Pursuant to Rule 54(d)(2)(B), the grounds and reasons for granting this relief, as well as the amounts sought are stated in the accompanying Memorandum which is filed contemporaneously herewith and incorporated as if restated herein.

Respectfully Submitted,

PETER R. BREGGIN, MD. GINGER ROSS BREGGIN By Counsel

By: /s/ William M. Stanley
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CERTIFICATE

I hereby certify that on the 8th day of February, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Counsel for the Plaintiff:

Counsel for the Defendant Dr. Ruby:

By: /s/ William M. Stanley

